

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

AGWAY FARM & HOME SUPPLY, LLC,¹

Debtor.

Chapter 11

Case No. 22-10602 (JKS)

Re: Docket No. ____

**ORDER GRANTING EXPEDITED MOTION TO DESIGNATE STALKING HORSE
PURCHASER, APPROVE STALKING HORSE PURCHASE AGREEMENT, AND
PROVIDE BID PROTECTIONS**

Upon consideration of the motion (the “*Motion*”) for entry of an order designating Myron Bowling as a Stalking Horse Bidder, approval of the Myron Bowling APA, and approval of Bid Protections for Myron Bowling; and this Court having considered the Motion, the arguments of counsel and the evidence presented at the hearing to consider the Motion, and the entire record; and due and sufficient notice of the Motion, hearing to consider the Motion, and the relief sought in the Motion having been given under the particular circumstances; and it appearing that no other or further notice need be provided; and the Court having reviewed the Motion and all objections to the Motion (the “*Objections*”); and it appearing that the relief requested in the Motion is in the best interest of the Debtor, its estate, its creditors, and other parties in interest; and after due deliberation and good and sufficient cause appearing for the relief sought,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein and any Objections not resolved consensually or otherwise withdrawn are expressly OVERRULED.
2. Myron Bowling is approved as the Stalking Horse Bidder for the Fixed

¹ The last four digits of the Debtor’s federal tax identification number are 1247. The Debtor’s address is 6606 W. Broad Street, Richmond, VA 23230.

Assets.

3. The Myron Bowling APA is approved.
4. The Debtor may provide Myron Bowling with a break-up fee in the amount of \$18,450.00 in the event all of the Fixed Assets are sold to an overbidder other than Myron Bowling.
5. This Court shall retain jurisdiction over any and all matters relating to this Order or its enforcement.